

# **EXHIBIT F**

**If you purchased Wallboard DIRECTLY from one or more of the companies listed below, your rights may be affected by proposed Settlements**

Proposed class settlements totaling \$44.5 million have been reached with several Defendants in *In re Domestic Drywall Antitrust Litigation*, MDL No. 2437 and 13-MD-2437, pending in the U.S. District Court for the Eastern District of Pennsylvania.

If you purchased wallboard from CertainTeed Gypsum, Inc., USG Corporation, United States Gypsum Company, New NGC, Inc., Lafarge North America, Inc., Eagle Materials, Inc., American Gypsum Company LLC, PABCO Building Products, LLC, TIN, Inc., or their subsidiaries (including L&W Supply Corporation) (collectively, the “Defendants”), between January 1, 2012 and November 30, 2014, you may be a class member. Wallboard refers to paper-backed gypsum wallboard, which is also known as drywall or plasterboard.

**What is the lawsuit about?** Plaintiffs allege that Defendants violated the federal antitrust laws by agreeing to fix prices for paper-backed gypsum wallboard. As a result, Plaintiffs claim that direct purchasers of paper-backed gypsum wallboard paid more for the products than they should have paid. Plaintiffs seek to recover damages and injunctive relief, together with litigation costs and expenses and attorneys’ fees. The Defendants deny Plaintiffs’ allegations, and the Court has not determined who is right or who is wrong. Plaintiffs have now reached an agreement with TIN Inc. (“TIN”) to partially settle the lawsuit. Plaintiffs have also reached a separate agreement with USG Corporation, United States Gypsum Company, and USG Corporation’s subsidiary L&W Supply Corporation (collectively, “USG”) to partially settle the lawsuit. The litigation is continuing against the other Defendants.

**Who is included?** The TIN and USG Settlement Classes include all persons or entities that purchased paper-backed gypsum wallboard in the United States directly from any of the

Defendants or their subsidiaries from January 1, 2012 through November 30, 2014. Excluded from the Settlement Classes are Defendants, the officers, directors and employees of any Defendant, the parent companies, subsidiaries and affiliates of any Defendant, the legal representatives and heirs or assigns of any Defendant, any federal governmental entities and instrumentalities of the federal government, any judicial officer presiding over the Action, and any member of his or her immediate family and judicial staff.

A Notice of Proposed Settlement (“Notice”) was mailed to direct purchasers of gypsum wallboard on or about \_\_\_\_\_. The Notice describes in more detail the litigation and the options available to potential members of the Settlement Classes with respect to the TIN and USG settlements. If you did not receive the Notice, you may obtain a copy at [www.\\_\\_\\_\\_\\_](http://www._____) or by calling \_\_\_\_-\_\_\_\_-

**What do the settlements provide?** TIN has agreed to pay \$5.25 million and cooperate with Plaintiffs in their continuing prosecution of the claims against the non-settling Defendants, in exchange for the release and dismissal of TIN from the lawsuit. Additionally, USG has agreed to pay \$39.25 million and provide cooperation, in exchange for the release and dismissal of USG from the lawsuit.

**Your rights may be affected.** If you purchased paper-backed gypsum wallboard in the United States directly from any Defendant or its subsidiaries from January 1, 2012 through November 30, 2014, you are a member of the TIN and USG Settlement Classes unless you elect to be excluded. If you wish to remain in the TIN and USG Settlement Classes, you do not need to take any action at this time, and your interests will be represented by Plaintiffs and Settlement Class Counsel.

If you do not want to be bound by one or both of these settlements, you must submit a written request for exclusion from such settlement, **postmarked no later than** \_\_\_\_\_ [80 days from the date the settlements are preliminarily approved].

If you exclude yourself from the TIN Settlement Class, you will not be part of the TIN settlement, but you will preserve your right to file or maintain your own lawsuit against TIN, and you will not be bound by any judgment dismissing TIN from the lawsuit. If you exclude yourself from the USG Settlement Class, you will not be part of the USG settlement, but you will preserve your right to file or maintain your own lawsuit against USG, and you will not be bound by any judgment dismissing USG from the lawsuit. You will not be able to collect money from any settlement from which you exclude yourself. Excluding yourself from either settlement will have no effect on your rights regarding Defendants other than TIN and USG.

For any settlement of which you do not opt out, you have the right to object to the terms of the settlement or to Plaintiffs' request to utilize up to \$2.5 million of the TIN and USG settlement funds to pay ongoing litigation expenses. Your objection must be **filed no later than** \_\_\_\_\_ [80 days from the date the settlements are preliminarily approved].

More information on objecting to the settlements or requesting exclusion from the settlements can be found in the Notice and on the settlement website, at [www.\\_\\_\\_\\_\\_](http://www._____).

The Court will hold a hearing on \_\_\_\_\_ [at least 120 days from the date of the preliminary approval order] at \_\_\_\_\_. m. at the James A. Byrne United States Courthouse, 601 Market Street, Philadelphia, PA 19106, Courtroom 3A to consider whether the TIN and USG settlements are fair and should be approved. The Court will also consider whether to approve Plaintiffs' request to use up to \$2.5 million of the TIN and USG settlement funds to pay ongoing litigation expenses. The hearing may be continued without further notice.

If you believe you are a member of the Settlement Classes and you have not received a Notice in the mail, you are urged to obtain a copy of the Notice, which provides more detailed information about your rights regarding the TIN and USG settlements.

To obtain a copy of the Notice, or if you have questions concerning the TIN or USG settlements or this litigation, visit [www.uscourts.gov](http://www.uscourts.gov), or you may call \_\_\_\_-\_\_\_\_-\_\_\_\_. **Please do not contact the Court.**

Dated: \_\_\_\_\_

BY ORDER OF:

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The United States District Court  
for the Eastern District of Pennsylvania